

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

DENNIS BERGERON,

CASE NO: 13-cv-10879

JUDGE: Victoria A. Roberts

Plaintiff,

vs.

MOTOR CITY WASTE LIMITED LIABILITY COMPANY,
JAMES REYNOLDS,
ROGAN ROLLOFF SERVICE INC., and
HARRY ROGAN,

Defendants.

GOLD STAR LAW, P.C.
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OBJECTIONS TO PLAINTIFF'S PRELIMINARY EXPERT LIST

NOW COME the Defendants, by and through their attorney, Phillip Strehle, and for their Objections states as follows:

1. On June 7, 2013 this Court entered a Scheduling Order requiring that all parties must file their Witness Lists by July 8, 2013.
2. This Scheduling Order required that all Expert Witnesses also be disclosed by July 8, 2013.
3. On July 8, 2013 Plaintiff filed a Preliminary Witness List that did not include any experts.
4. On August 19, 2013 Plaintiff filed a Preliminary Expert Witness List.
5. The filing on August 19, 2013 by Plaintiff is a violation of the Scheduling Order entered by the Court on June 7, 2013.

6. Plaintiff should not be permitted to call any expert witnesses at Trial because he did not comply with the Court's Scheduling Order of June 7, 2013.

WHEREFORE, Defendants pray that this Court strike plaintiff's Preliminary Expert Witness List and/or prohibit him from calling any expert witnesses at Trial because he did not comply with the Court's Scheduling Order of June 7, 2013.

Dated: August 20, 2013

Respectfully Submitted,

PROOF OF SERVICE

The undersigned certifies that the foregoing instrument was served upon all parties and/or Non-Parties to the above cause by depositing a copy thereof in the U.S. Mail, postage prepaid, in an envelope addressed to each of the attorneys of record therein, and the Non-Party itself, at their respective addresses disclosed on the pleadings or otherwise, on the 20th day of August, 2013.

<input checked="" type="checkbox"/> X U.S. Mail	<input type="checkbox"/> Fax
<input type="checkbox"/> Federal Express	<input type="checkbox"/> UPS
<input type="checkbox"/> Hand Delivered	<input type="checkbox"/> Other

/S/ Chelsea Lizzet
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